EXHIBIT A

DECLARATION OF GEORGE VUJOVICH IN SUPPORT OF PETITIONER'S MEMORANDUM IN RESPONSE TO ORDER TO SHOW CAUSE

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

| SCOTT D. BORAS INC., |) |
|--------------------------|---|
| Petitioner, |) |
| VS. |) Case No. 09-CIV-8369) ECF Case |
| GARY ANTONIAN SHEFFIELD, | |
| D 1 |) Scheindlen, D.J. |
| Respondent. | DECLARATION OF GEORGE VUJOVICH IN SUPPORT OF MEMORANDUM IN RESPONSE TO ORDER TO SHOW CAUSE |

Pursuant to Section 1746 of Title 28 of the United States Code, George Vujovich declares and states as follows:

- 1. My name is George Vujovich. I am over eighteen years of age and competent to make this declaration. I submit this Declaration in Support of the Memorandum in Response to the Court's October 8, 2009 Order to Show Cause submitted by Scott D. Boras, Inc. ("the Petitioner") d/b/a Boras Corporation.
- 2. I am and have been an attorney duly licensed to practice in the state of California since 1982. I began as a consultant with the Petitioner in 1987, and have been employed by Petitioner for nearly 20 years. I am a certified agent by the Major League Players Association.
- 3. I have been involved in 2 arbitrations of disputes between players and agents before the Major League Baseball Players Association's (MLBPA) Voluntary Dispute Panel.

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- 4. I have personal knowledge of and participated in the events giving rise to the above captioned litigation, including the arbitration of the dispute between Petitioner and Respondent.
- 5. During the arbitration proceeding between Petitioner and Respondent, the Parties agreed that anything said, presented or discussed during the arbitration would be kept confidential.
- 6. During the proceeding, the Arbitrator adopted and approved the Parties' confidentiality agreement and stated for the record that "the parties have agreed ... that anything said in this room, presented in this room, discussed in this room in arbitration be kept confidential and not be publicized beyond this room." The only exception to this agreement was for internal MLBPA purposes.
- 7. The Arbitrator's statements as quoted herein and in the Memorandum in Response to the Court's Order to Show Cause accurately reflect the transcript of the arbitration proceedings.
- 8. The Petition and the Arbitrator's Award contain confidential information relating, e.g., to proprietary business matters such as salary negotiation strategy, the public dissemination of which would be detrimental to both Petitioner and Respondent.
- 9. The public dissemination of confidential information contained in the Petition in print media, television or over the internet potentially could cause serious harm to future business dealings of both Parties and would be contrary to their reasonable expectations of confidentiality, which were fully honored by the Arbitrator.

10. In presenting this case, including confidential information, the Parties have relied on their confidentiality agreement, the Arbitrator's adoption and approval of the confidentiality agreement.

Pursuant to 28 U.S.C. § 1746, I declare, under the penalty of perjury, that the foregoing is true and correct.

George Vujovich

Executed in the State of California, this // day of October, 2009.